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13 Attorneys for Plaintiff and *Qui Tam* Relator,
14 Leiasa Beckham

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA, *ex rel.*
18 LEIASA BECKHAM, et al.,

19 Plaintiffs,

20 vs.

21 1850 BRYANT LAND LLC, et al.,
22 Defendants.

CASE NO.: 3:21-cv-05742-RS-DMR

RELATOR'S UNOPPOSED
APPLICATION TO MODIFY THE
CHIEF MAGISTRATE JUDGE'S
AUGUST 19, 2024 ORDER [DKT.
110] TO EXTEND THE TIME FOR
RELATOR TO SERVE HER
UPDATED SETTLEMENT
CONFERENCE BRIEF, AND
DEFENDANTS' TIME TO MEET
AND CONFER AND EMAIL
THEIR JOINT RESPONSE
THERE TO

23 COMES NOW, Plaintiff and Relator Leiasa Beckham (Relator), and submits this
24 unopposed application to modify Chief Magistrate Judge Donna M. Ryu's August 19, 2024
25 Order (Dkt. 110) to (a) extend Relator's deadline to serve her updated settlement conference
26 brief, originally due by September 13, 2024, to **October 4, 2024**, and (b) extend Defendants
27 deadline to meet and confer and send their joint email response, originally due by September
28 20, 2024, to **October 11, 2024**.

This application is made to permit Relator time to seek replacement counsel to
represent her in this action.

After advising Defendants' counsel of Relator's intent to file this Application,

1 Defendants' counsel requested Relator's counsel to notify the Court of the following
2 Defendants' position:

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4 "Defendants take no position on Plaintiff's request that the
5 deadline to serve an updated settlement brief be extended by 3
6 weeks to October 4, and that Defendants' deadline to meet and
7 confer and indicate whether they are interested in further
8 settlement discussions be likewise extended to October 11.
9 Defendants oppose any further extensions. Defendants note that
10 Plaintiff has had multiple years in this case (and the preceding
11 state court litigation) to provide the citations and information
12 requested by the Court in its August 19, 2024 Minute Order (ECF
13 No. 110). Plaintiff's lead counsel, Mr. Hanagami, has represented
her throughout this case, including signing the original complaint
and the First, Second, and Third amended complaints, each of
which alleges that Defendants entered into a Backroom Deal and
defrauded the federal and state government of millions of dollars.
His co-counsel, Mr. Ball, not only represents Plaintiff in this case
but also represented her in the state court lawsuit. If the citations
that the Court requested Plaintiff to provide in an updated
settlement brief exist, providing them should not be contingent on
the retention of new counsel."

14 Respectfully submitted,

15 THE BALL LAW FIRM
16 HANAGAMI LAW, A.P.C.

17 Dated: September 12, 2024

By: /s/William K. Hanagami
18 William K. Hanagami
19 Attorneys for Plaintiff and Qui Tam Relator,
20 Leiasa Beckham
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